

change reform. The interconnection piece focuses on measures to stimulate competition. Congress recognized that the timing and benefits of competition in rural areas remain speculative, as evidenced in the numerous rural safeguards in the 1996 Act.²⁴ In contrast, the unfinished universal service joint board is the admitted linchpin of the goal of evolving services, reasonable and affordable rates and services in rural areas.

With its focus on stimulating competition, the Order operates primarily to advance the immediate interests of competing carriers. Until universal service, infrastructure sharing and access reform are completed and harmonized, the measures to safeguard the interests of residential and rural consumers and their traditional universal service providers in the new environment will not be in place and proper economic entry signals will remain obscured. Thus, although the Commission urges that new “competition” must go forward under its interconnection regime pending review,²⁵ its own words support the contrary conclusion: A stay will prevent entry under the perverse marketplace signals that will remain in place until the rest

²⁴ *E.g.*, section 251(f) (1) and (2) (rural exemption, modification and suspension relief from measures to “jump start” competition), section 253 (b) (preserving state universal service authority in preempting bans to competition); section 253 (f) (reserving state power to limit competitors in rural LEC areas to area-wide entry); section 254 (requiring “sufficient” universal service cost recovery to achieve national policy)’ section 214(e) (providing for support to state-designated universal service providers) and section 259 (recognizing right of small and rural universal service providers to share infrastructure economics of scale of neighboring large ILECs under non - common carrier business arrangements).

²⁵ *See*, Order of September 17, 1996, FCC 96-378 denying stay of GTE Corporation and Southern New England Telephone Company.

of the “trilogy” defines the post-Act competitive marketplace ground rules and effectuates the consumer safeguards Congress enacted.²⁶

III. CONCLUSION.

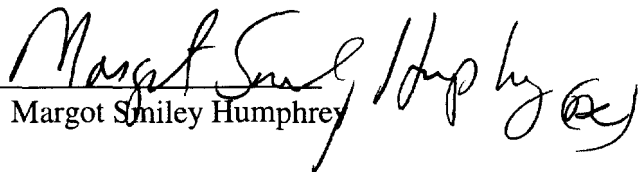
The RTC respectfully requests the Commission to grant this limited stay. Limited relief that stays the rules in sections 51.303, 51.405 and 51.809 is appropriate because the RTC has shown that there is a high probability that it will prevail on the merits in a challenge to these rules. A stay will prevent irreparable injury to the members of the associations and the rural customers they serve. The injury to petitioners from denial of a stay is greater than any conceivable injury that other parties would suffer if these rules are allowed to become effective immediately. A stay will promote the public interest by preserving the status quo pending the outcome of judicial review and ensuring an orderly transition to the new regime provided in the

²⁶ The need for decisions applying the rural exemption provides a further concrete example of why, in the unique circumstances presented by this landmark legislation, a stay so issues on review may be resolved will affirmatively serve the public interest: The state must determine, in part, whether a bona fide request for exempted interconnection under section 251(f)(1)(b) “is consistent with section 254. . .,” the Act’s universal service section. Until the pending joint board proceeding to implement that section completes that task, it is simply not possible to determine how an interconnection burden will compare with the Act’s universal service mandates.


Telecommunications Act. A stay will also benefit the public by preventing the wasteful expenditure of financial and personnel resources.

Respectfully submitted,

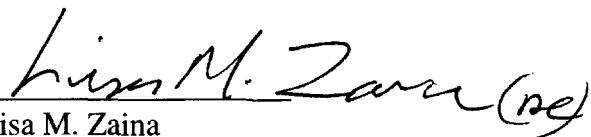
THE RURAL TELEPHONE COALITION

By: 
Margot Smiley Humphrey

National Rural Telecom Association
Koteen & Naftalin, LLP
1150 Connecticut Ave., NW, Suite 1000
Washington, D.C. 20036
(202) 467-5700

By: 
David Cosson
L. Marie Guillory

National Telephone Cooperative Association
2626 Pennsylvania Ave., NW
Washington, D.C. 20037
(202) 298-2300

By: 
Lisa M. Zaina

Organization for the Promotion and Advancement
of Small Telecommunications Companies
21 Dupont Circle, NW, Suite 700
Washington, D.C. 20036
(202) 659-5990

October 2, 1996

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)	
)	
Implementation of the Local Competition)	CC Docket No. 96-98
Provisions in the Telecommunications)	
Act of 1996)	

AFFIDAVIT OF LAWRENCE C. WARE

Lawrence C. Ware, being duly sworn according to law, states as follows:

1. I am Vice President of the National Telephone Cooperative Association (NTCA). In that capacity, my duties include assisting NTCA members with business development, exploring ways that NTCA members may deploy emerging technologies, and responding to new regulations.
2. Prior to joining NTCA, I held general management positions in the telecommunications industry for 35 years which is inclusive of my 19 years of service as the general manager of the Garden Valley Telephone Company (Garden Valley) from 1977 to March 1996. Garden Valley is a rural telephone cooperative serving over 14,000 access lines and headquartered in Erskine, Minnesota. The company currently serves less than 3 subscribers per route mile of facilities in 24 exchanges. As general manager I was responsible for the day to day operations of the company which at times included referring to outside technical experts to help guide the company business decisions.

3. In addition to my position with Garden Valley, I have held other positions in the telecommunications industry that have involved me with the operating and development decisions of small telephone companies. I have served as a director and president of the Minnesota Telephone Association (St. Paul) and was founding board member and chairman of Minnesota Equal Access Network Services ("MEANS") (Plymouth), a group of approximately 60 telcos that collectively provide equal-access and operate a fiber optic network throughout Minnesota. Other work with small, rural telephone companies include my positions as chairman of NTCA's Industry Committee and my service on the National Exchange Carrier Association (NECA) Board of Directors from its inception until 1992. In 1991 and 1992, I served as NECA board chairman. Additionally, I have personally appeared before the Minnesota Public Utilities Commission and the Minnesota legislature on behalf of small telephone companies in Minnesota.

4. I am familiar with the Federal Communications Commission's (FCC) *First Report and Order* issued August 8, 1996. This order purports to establish a framework of national rules implementing the local competition provisions of the Telecommunications Act of 1996. More specifically, the order details the rules implementing Section 251(f)(1) of the Act which provides for an exemption from Section 251(c) interconnection requirements as applied to rural telephone companies. The order and accompanying rules place the burden on the rural telco to prove that it should be entitled to maintain the exemption in Section 251(f)(1) and seems to interpret a continuing exemption as an unlikely exception despite the significant differences between rural and other telephone companies. As a former general manager of a rural telephone company and as a long term administrator in the telecommunications industry in general, I can

attest to the impact these new rules will have on small, rural telephone companies.

5. The order also establishes a strict standard that must be met to meet the burden of proof on economic consequences. Section 51.405 (c) of the rules requires "an incumbent LEC [to] offer evidence that the application of the requirements of Section 251(c) of the Act would be likely to cause [an] undue economic burden beyond the economic burden that is typically associated with efficient competitive entry." Both the fact that the burden of proof has been allocated to the incumbent rural telco and that the Commission has further defined the burdens by a vague and unconventional standard and suggested that the exemption is reserved for exceptional cases are enough to provoke the prudent telephone company manager to make the necessary preparations to effectively deal with impending bona fide requests. The statute on its face, and the Commission proceeding to implement Section 251 did not convey to managers of small companies the impending issue of burden of proof and the cost that it entails. Now that the burden of proof has been placed on incumbent rural telcos (47 C.F.R. § 51.405) under very demanding standards, managers must face the fact that huge costs associated with attempts to meet that burden may prevent them from maintaining their exemptions contained in the Act.

6. The Commission's rules become effective on October 1, 1996, and as currently written, rural telephone companies such as Garden Valley will be forced to make substantial investments beyond those intended by Congress, if they have not done so already.

7. According to section 251(f)(1)(B) of the statute, once a request is filed, the

state commission has 120 days to determine whether the exemption will be removed. Knowing the short span of time a rural telephone company would have once a request is made, a manager would have to complete certain tasks in advance of a bona fide request. To compile the evidence to prove that the bona fide request presents an "undue economic burden beyond the economic burden that is typically associated with efficient competitive entry," most incumbent rural LECs will have to hire outside experts to perform detailed studies. Because there are no detailed rules and no accepted industry practices for conducting TELRIC studies, the studies will require accounting, economic, and engineering expertise.

8. I have conferred with the engineering and accounting consultants currently used by Garden Valley to determine the cost of engineering design and TELRIC studies. In my capacity as general manager of Garden Valley I conferred with these same outside consultants for a number of years on matters requiring such studies. In speaking with the consultants with regard to this matter, I learned that the charge for a TELRIC study to determine the cost underlying charges for interconnection, unbundled elements and resale prices is estimated at \$30,000.

9. A TELRIC study must be preceded by an engineering design study to determine the cost of modern efficient plant. The professional engineering firm that I consulted quoted \$210,000 as the approximate price of an engineering design study. The charge for an engineering study upon which a TELRIC study would be based may be somewhat less. The firm typically performs such engineering and design work for small independent telephone companies

which will normally charge between \$15 and \$20 per access line. Of the small rural companies the firm services, Garden Valley because of its 14,000 access lines actually possesses the economies of scale to be offered the \$15 low-end of the range for the study. On a per access line basis, smaller rural telcos will have to pay more than the price quoted for Garden Valley for such a study. In my capacity as NTCA Vice President, I am aware that the average NTCA member serves 4,378 access lines, which means that the average member would pay approximately \$60,000 to \$90,000 for the required engineering study.


10. In addition to the expense of hiring such technical outside consultants, a small company would also have to hire legal counsel to advise its managers as to how to insure proper compliance with the rules and to prepare for hearings that would take place at the state commission. Again, the state commission has 120 days to act on the bona fide request even under the heavier standard the FCC has interposed which dictates the need for such preparations. A telephone company would be forced to hire counsel immediately in anticipation of the filing of a bona fide request because once the request is made, the 120 day period is triggered. It would be futile for an attorney and other consultants to try to prepare physical plant design cost studies and a case in this limited time.

11. There is also the matter of a manager and his staff's time being drawn away from the actual running of the company to attend to these matters. In this sense, the parties that matter the most are also disserved the most by the commission's new rules. The customers of Garden Valley and other small rural telephone companies lose the attention of their

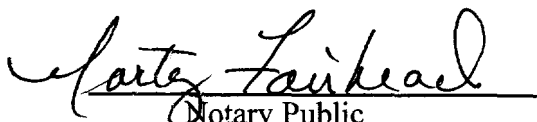
management when their management is forced to devote time to litigating administrative proceedings. In a small company, the business of meeting with attorneys, consulting with outside experts, and making the general preparations necessary to appear in state proceedings is performed directly by the company's management. A proceeding to terminate the rural exemption is likely to have a significant effect on any small company and would require the direct involvement of its management.

12. Customers and the general public will have no means of recovering the losses that result when management and operational personnel are forced to divert time to needless administrative proceedings. The burden of proof rules will cause irreparable injury to rural telcos because they may have to expend large amounts of the company's financial and human resources in advance only to find the rules will be changed on appeal. Further, there is a strong likelihood that the telcos will not be able to meet the substantial burden contained in section 51.405(c). The burden of these costs will fall on those customers who are not attractive for competitors to serve. These customers will be deprived of the rural safeguards provided for in the 1996 Act and have no means of recovering the loss of this benefit.

The affiant says nothing further.


Lawrence C. Ware

Subscribed and sworn to
before me this 27th day of
August, 1996.


Marty Fairhead
Notary Public
My commission expires 5/31/99

CERTIFICATE OF SERVICE

I, Rita H. Bolden, certify that a copy of the foregoing Motion for Stay Pending Judicial Review of the Rural Telephone Coalition was served on this 2nd day of October 1996, by first-class, U.S. Mail, postage prepaid on all parties on record in the interconnection proceeding, CC Docket 96-98.

Rita H. Bolden
Rita H. Bolden

Chairman Reed E. Hundt
Federal Communications Commission
1919 M Street, N.W., Room 814-0101
Washington, D.C. 20554

Commissioner James H. Quello
Federal Communications Commission
1919 M Street, N.W., Room 802-0106
Washington, D.C. 20554

Commissioner Rachelle B. Chong
Federal Communications Commission
1919 M Street, N.W., Room 844-0105
Washington, D.C. 20554

Commissioner Susan Ness
Federal Communications Commission
1919 M Street, N.W., Room 832-0104
Washington, D.C. 20554

Mr. Kent Nilsson, Chief
Network Services Division
Common Carrier Bureau
Federal Communications Commission
2000 L Street, N.W., Room 253
Washington, D.C. 20554

International Transcription Service
2100 M Street, N.W.
Suite 140
Washington, D.C. 20037

Janice Myles (1cc&1disk)
Federal Communications Commission
1919 M Street, NW
Room 544
Washington, DC 20554

David L. Meier
Cincinnati Bell
201 E. Fourth Street
P.O. Box 2301
Cincinnati, OH 45201

Robert J. Hix
Vincent Majkowski
Colorado PUC
1580 Logan Street
Office Level 2
Denver, CO 80203

Bruce Hagen
Susan E. Wefald
Leo M. Reinbold
North Dakota PSC
600 E. Boulevard
Bismarck, ND 58505

Ann Kutter
Douglas Elfner
NYS Consumer Protection Board
99 Washington Avenue - Suite 1020
Albany, NY 12210

W. Benny Won #76385
Public Utility Section
Oregon Department of Justice
1162 Court Street, NE
Salem, OR 97310

Carol Weinhaus
Telecommunications Industries Analysis Project
University of Florida College of Business Admin.
121 Mt. Vernon Street
Boston, MA 02108

Edward C. Addison
Virginia State Corporation Commission
Division of Communications
P.O. Box 1197
Richmond, VA 23218

Richard A. Finnigan
Washington Independent Telephone Assn.
2405 Evergreen Park Drive, SW
Suite B-1
Olympia, WA 98502

Philip L. Verveer
Sue D. Blumenfeld
Thomas Jones
Willkie Farr & Gallagher
Three Lafayette Centre - 1155 21st Street, NW
Washington, DC 20036

David Turetsky
Carl Shapiro
Antitrust Division
US Department of Justice
555 4th Street, NW - Room 8104
Washington, DC 20001

Andrew Joskow
John Haynes
Antitrust Division
US Department of Justice
555 4th Street, NW - Room 8104
Washington, DC 20001

Barry Grossman
Antitrust Division
US Department of Justice
555 4th Street, NW - Room 8104
Washington, DC 20001

Michael F. Altschul
Randall S. Coleman
Cellular Telecommunications Industry Assn.
1250 Connecticut Avenue, NW
Suite 200
Washington, DC 20036

Rachel J. Rothstein
Ann P. Morton
Cable & Wireless, Inc.
8219 Leesburg Pike
Vienna, VA 22182

Howard J. Symons
Sara S. Seidman
Mintz, Levin, Cohn, Ferris, Glovsky and
Popeo, PC
701 Pennsylvania Avenue, NW - Suite 900
Washington, DC 20004

Bridger Mitchell
Charles River Associates, Inc.
285 Hamilton Avenue
Suite 370
Palo Alto, CA 94301

Anne K. Bingaman
Antitrust Division
US Department of Justice
555 4th Street, NW - Room 8104
Washington, DC 20001

John Henly
Antitrust Division
US Department of Justice
555 4th Street, NW - Room 8104
Washington, DC 20001

Donald J. Russell
Luin Fitch
Antitrust Division
US Department of Justice
555 4th Street, NW - Room 8104
Washington, DC 20001

James D. Ellis
Robert M. Lynch
David F. Brown
SBC communications, Inc.
175 E. Houston - Room 1254
San Antonio, TX 78205

Danny E. Adams
John J. Heitmann
Kelley Drye & Warren, LLP
1200 19th Street, NW
Washington, DC 20036

Cindy Schonhaut
Intelcom Group (USA) Inc.
9605 East Maroon Circle
Englewood, CO 80112

Albert H. Kramer
Robert F. Aldrich
Dickstein, Shapiro & Morin, LLP
2101 L Street, NW
Washington, DC 20037

Stephen R. Rosen
Theodore M. Weitz
Lucent Technologies, Inc.
475 South Street
Morristown, NJ 07962

Riley M. Murphy
Charles Kallenbach
American Communications Services, Inc.
131 National Business Parkway
Suite 100
Annapolis Junction, MD 20701

Brad E. Mutschelknaus
Steve A. Augustino
Marieann Zochowski
Kelley Drye & Warren
1200 19th Street, NW - Suite 500
Washington, DC 20036

Mary L. Brown
MCI
1801 Pennsylvania Avenue, NW
Washington, DC 20006

David W. Carpenter
Peter D. Keisler
Sidley & Austin
1722 Eye Street, NW
Washington, DC 20006

David L. Lawson
David M. Levy
Sidley & Austin
1722 Eye Street, NW
Washington, DC 20006

Mark C. Rosenblum
Roy E. Hoffinger
AT&T
295 North Maple Avenue
Room 324511
Basking Ridge, NJ 07920

Stephen C. Garavito
Richard H. Rubin
AT&T
295 North Maple Avenue
Room 324511
Basking Ridge, NJ 07920

Joel E. Lubin
Richard N. Clarke
AT&T
295 North Maple Avenue
Room 324511
Basking Ridge, NJ 07920

Karen E. Weis
AT&T
295 North Maple Avenue
Room 324511
Basking Ridge, NJ 07920

Kent E. Lillie
Shop At Home, Inc.
5210 Schubert Road
Knoxville, TN 37912

James A. Eibel
Network Reliability Council II Secretariat
7613 William Penn Place
Indianapolis, IN 46256

Christopher C. Kempley
Deborah R. Scott
Arizona Corporation Comm.
1200 West Washington Street
Phoenix, AZ 85007

Robert S. Tongren
David C. Bergmann
Office of the Consumers' Counsel
77 South High Street - 15th Floor
Columbus, OH 43266

Thomas J. O'Brien
Karen J. Hardie
Office of the Consumers' Counsel
77 South High Street - 15th Floor
Columbus, OH 43266

Agris Pavlovskis
Michigan Exchange Carriers Assn., Inc.
1400 Michigan National Tower
Lansing, MI 48901

Glen A. Schmiede
Mark J. Burzych
Foster, Swift, Collins & Smith, PC
313 South Washington Square
Lansing, MI 48933

Peter A. Rohrbach
Linda L. Oliver
Kyle D. Dixon
Hogan & Hartson, LLP
555 13th Street, NW
Washington, DC 20004

Bradley C. Stillman
Dr. Mark N. Cooper
Consumer Federation of America
1424 16th Street, NW
Washington, DC 20036

Steven T. Nouse
PUC of Ohio
180 East Broad Street
Columbus, OH 43266

Stephen G. Oxley
Wyoming PSC
700 W. 21st Street
Cheyenne, WY 82002

Werner K. Hartenberger
Leonard J. Kennedy
Dow, Lohnes & Albertson
1200 New Hampshire Avenue, NW - Suite 800
Washington, DC 20036

Laura H. Phillips
J.G. Harrington
Dow, Lohnes & Albertson
1200 New Hampshire Avenue, NW - Suite 800
Washington, DC 20036

Stephen L. Goodman
Halprin, Temple, Goodman & Sugrue
1100 New York Avenue
Suite 650 - East Tower
Washington, DC 20005

John G. Lamb, Jr.
Northern Telecom Inc.
2100 Lakeside Boulevard
Richardson, TX 75081

Wayne V. Black
C. Douglas Jarrett
Susan M. Hafeli
Keller and Heckman
1001 G. Street, NW - Suite 500 West
Washington, DC 20001

Mark J. Golden
Robert R. Cohen
Personal Communications Industry Assn.
500 Montgomery Street - Suite 700
Alexandria, VA 22314

Dana Frix
Maury C. Albert
Antony R. Petrilla
Swidler & Berlin, Chtd.
3000 K Street, NW - Suite 300
Washington, DC 20007

Timothy R. Grahm
Robert M. Berger
Joseph M. Sandri, Jr.
Winstar Communications, Inc.
1146 19th Street, NW
Washington, DC 20036

Laurie Pappas
Texas Office of Public Utility Counsel
7800 Shoal Creek
Suite 290-E
Austin, TX 78757

Charles C. Hunter
Hunger & ow, PC
1620 Eye Street, NW
Suite 701
Washington, DC 20006

Thomas P. Hester
Kelly R. Welsh
John T. Lenahan
Ameritech
30 South Wacker Drive
Chicago, IL 60606

Mike Pabian
Larry Peck
Gary Phillips
Ameritech
30 South Wacker Drive
Chicago, IL 60606

Antoinette Cook Bush
Linda G. Morrison
Skadden, Arps, Slate, Meagher & Flom
1440 New York Avenue, NW
Washington, DC 20005

William P. Barr
Ward W. Wueste
Gail L. Polivy
GTE
1850 M Street, NW - Suite 1200
Washington, DC 20036

Richard E. Wiley
R. Michael Senkowski
Jeffrey S. Linder
Wiley, Rein & Fielding
1776 K Street, NW
Washington, DC 20006

Leon M. Kestenbaum
Jay C. Keithley
H. Richard Juhnke
1850 M Street, NW - 11th Floor
Washington, DC 20036

Rodney J. Joyce
J. Thomas Nolan
Ginsburg, Feldman and Bress
1250 Connecticut Avenue, NW
Washington, DC 20036

Madelyn M. DeMatteo
Alfred J. Brunetti
Maura C. Bollinger
SNET
227 Church Street
New Haven, CT 06506

Michael H. Hammer
Michael G. Jones
Jennifer L. Desmond
Willkie Farr & Gallagher
Three Lafayette Centre - 1155 21st Street, NW
Washington, DC 20036

Genevieve Morelli
Competitive Telecommunications Assn.
1140 Connecticut Avenue, NW
Suite 220
Washington, DC 20036

Robert J. Aamoth
Wendy I. Kirchick
Reed Smith Shaw & McClay
1301 K Street, NW
Suite 1100 - East Tower
Washington, DC 20005

Aaron I. Fleischman
Richard Rubin
Fleischman and Walsh, LLP
1400 16th Street, NW
Washington, DC 20036

Mitchell F. Brecher
Steven N. Teplitz
Fleischman and Walsh, LLP
1400 16th Street, NW
Washington, DC 20036

Paul B. Jones
Janis A. Stahlhut
Donald F. Shephard
Timer Warner Communications Holdings, Inc.
300 Stamford Place
Stamford, CT 06902

Richard J. Metzger
Emily Williams
Association for Local Telecommunications Services
1200 19th Street, NW
Suite 560
Washington, DC 20036

Daniel J. Brenner
Neal M. Goldberg
David L. Nicoll
NCTA
1724 Massachusetts Avenue, NW
Washington, DC 20036

Howard J. Symons
Cherie R. Kiser
Christopher J. Harvie
Mintz, Levin, Cohn, Ferris, Glovsky and Popeo, PPC
701 Pennsylvania Avenue, NW - Suite 900
Washington, DC 20004

Charon R. Harris
Jennifer A. Purvis
Mintz, Levin, Cohn, Ferris, Glovsky and Popeo, PPC
701 Pennsylvania Avenue, NW - Suite 900
Washington, DC 20004

Saul Fisher
William J. Balcerski
NYNEX
1111 Westchester Avenue
White Plains, NY 10604

Jot D. Carpenter
Telecommunications Industry Assn.
1201 Pennsylvania Avenue, NW
Suite 315
Washington, DC 20044

David N. Porter
MFS Communications Co., Inc.
3000 K Street, NW
Suite 300
Washington, DC 20007

Andrew D. Lipman
Russell M. Blau
Swidler & Berlin, Chtd.
3000 K Street, NW
Suite 300
Washington, DC 20007

Paul Rodgers
Charles D. Gray
James Bradford Ramsay
NARUC
1102 ICC Building - P.O. Box 684
Washington, DC 20044

Robert B. McKenna
Kathryn Marie Krause
James T. Hannon
U S WEST
1020 19th Street, NW - Suite 700
Washington, DC 20036

Karen Finstad Hammel
Montana PSC
1701 Prospect Avenue
P.O. Box 202601
Helena, MT 59620

E. Barclay Jackson
New Hampshire PUC
8 Old Suncook Road
Concord, NH 03301

Stephen F. Mecham
160 East 300 South
P.O. Box 45585
Salt Lake City, UT 84145

Sheldon M. Katz
Vermont Department of Public Service
Drawer 20
Montpelier, VT 05620

Rolayne Ailts
SD PUC
500 E. Capital
Pierre, SD 57501

Edward D. Young, III
Michael E. Glover
Leslie A. Vial
1320 North Court House Road
Eighth Floor
Arlington, VA 22201

Joel B. Shifman
Maine PUC
242 State Street - State House Station No. 18
Augusta, ME 04333

Commissioner Lowell C. Johnson
Nebraska PSC
300 The Atrium
1200 N Street,
P.O. Box 94927
Lincoln, NE 68509

David Kaufman
New Mexico State Corporation Comm.
P.O. Box 1269
Santa Fe, NM 87504

Michael L. Ginsberg
160 East 300 South
P.O. Box 146751
Salt Lake City, UT 84145

George E. Young
Vermont Public Service Board
Drawer 20
Montpelier, VT 05620

Terrence P. McGarty
COMAV, Corp.
60 State Street - 22nd Floor
Boston, MA 02109

Richard M. Tettlebaum
Citizens Utilities Company
1400 16th Street, NW
Suite 500
Washington, DC 20036

Robert A. Mazer
Albert Shuldiner
Mary Pape
Vinson & Elkins
1455 Pennsylvania Avenue, NW
Washington, DC 20004

Earl Pace
BDPA
1250 Connecticut Avenue, NW
Suite 610
Washington, DC 20036

Richard N. Koch
10 Lilac Street
Sharon, MA 02067

Anne P. Schelle
American Personal Communications
One Democracy Center
6901 Rockledge Drive
Suite 600
Bethesda, MD 20817

Alan Ciamporcero
Pacific Telesis
1275 Pennsylvania Avenue, NW
Suite 400
Washington, DC 20004

Robert C. Schoonmaker
GVNW Inc./Management
P.O. Box 25969
Colorado Springs, CO 80936

Eric J. Branfman
GST Telecom, Inc.
3000 K Street, NW
Suite 300
Washington, DC 20007

J. Manning Lee
Teleport Communications Group, Inc.
One Teleport Drive
Suite 300
Staten Island, NY 10311

John Crump
National Bar Assn.
1225 11th Street, NW
Washington, DC 20001

Dwight E. Zimmerman
Illinois Independent Telephone Assn.
RR 13, 24B Oakmont Road
Bloomington, IL 61704

Aliceann Wohlbruck
National Association of Development Organizations
444 North Capitol Street, NW
Suite 630
Washington, DC 20001

Charles H. Kennedy
James A. Casey
Morrison & Foerster, LLP
2000 Pennsylvania Avenue, NW
Suite 5500
Washington, DC 20006

Charles H. Carrathers, III
Hunton & Williams
Riverfront Plaza, East Tower
951 East Byrd Street
Richmond, VA 23219

Mark J. Tauber
Kecia Boney
Mark J. O'Connor
Piper & Marbury, LLP
1200 19th Street, NW
Washington, DC 20036

Paul Glist
Cole, Raywid & Braverman
1919 Pennsylvania Avenue, NW
Suite 200
Washington, DC 20006

Anthony M. Black
Bell, Boyd & Lloyd
1615 L Street, NW
Suite 1200
Washington, DC 20036

Dana Frix
Swidler & Berlin
3000 K Street, NW
Suite 300
Washington, DC 20007

Mark J. Golden
Robert R. Cohen
Personal Communications Industry Assn.
500 Montgomery Street
Suite 700
Alexandria, VA 22314

Carolyn C. Hill
ALLTEL
655 15th Street, NW
Suite 220
Washington, DC 20005

Jerome K. Blask
Daniel E. Smith
Gurman, Blask & Freedman, Chtd
1400 16th Street, NW
Suite 500
Washington, DC 20036

Robert C. Glazier
Indiana Utility Regulatory Commission
302 W. Washington Street
Room E306
Indianapolis, IN 46204

Veronica M. Ahern
Nixon Hargrave Devans & Doyle, LLP
One Thomas Circle, NW
Suite 800
Washington, DC 20005

Antoinette R. Wike
North Carolina Public Staff Utilities Commission
P.O. Box 29520
Raleigh, NC 27626

Joe D. Edge
Richard J. Arsenault
Tina M. Pidgeon
Drinker, Biddle & Reath
901 15th Street, NW
Washington, DC 20005

Jere W. Glover
David W. Zesiger
US Small Business Administration
409 Third Street, SW
Suite 7800
Washington, DC 20416

Charles H. Helein
Helein & Associates, PC
8180 Greensboro Drive
Suite 700
McLean, VA 22102

C.J. Cain
Utilex, Inc.
P.O. Box 991
Greenville, NC 27834

James Baller
The Baller Law Group
1820 Jefferson Place, NW
Suite 200
Washington, DC 20036

Fiona Branton
Information Technology Industry Council
1250 Eye Street, NW
Washington, DC 20005

John T. Scott, III
Crowell & Moring
1001 Pennsylvania Avenue, NW
Washington, DC 20004

R. Glenn Rhyne
South Carolina PSC
P.O. Drawer 11649
Columbia, SC 29211

Michael A. Rump
Kansas City Power & Light Co.
1201 Walnut
P.O. Box 418679
Kansas City, MO 64141

B.B. Knowles
Georgia PSC
244 Washington Street, SW
Atlanta, GA 30334

Stephen E. Morgan
Ohio Edison Co.
78 South Main Street
Akron, OH 44308

Linda R. Evers
Ohio Edison Co.
76 South Main Street
Akron, OH 44308

Marc A. Stone
Fred Williamson & Associates, Inc.
2921 E. 91st Street
Suite 200
Tulsa, OK 74137

Pete Wanzenried
State of California
601 Sequoia Pacific Blvd.
Sacramento, CA 95814

David Heinemann
Julie Thomas Bowles
Kansas Corp. Comm.
1500 SW Arrowhead Road
Topeka, KS 66604

David C. Bergmann
Thomas J. O'Brien
Karen J. Hardie
Office of the Ohio Consumers' Counsel
77 South High Street - 15th Floor
Columbus, OH 43266

Colorado Independent Telephone Assn.
3236 Hiwan Drive
Evergreen, CO 80439

Nebraska Rural Development Comm.
P.O. Box 94666
Lincoln, NB 68509

Harold Crumpton
Missouri PSC
P.O. Box 360
Jefferson City, MO 65102

Brian R. Moir
Moir & Hardman
2000 L Street, NW
Suite 512
Washington, DC 20036

Lawrence St. Blanc
Gayle T. Kellner
Louisiana PSC
P.O. Box 91154
Baton Rouge, LA 70821

Maureen A. Scott
Pennsylvania PUC
P.O. Box 3265
Harrisburg, PA 17105

Jeffrey L. Sheldon
Sean A. Stokes
UTC
1140 Connecticut Avenue, NW
Suite 1140
Washington, DC 20036

Lee M. Weiner
Douglas W. Kinkoph
LCI International Telecom Corp.
8180 Greensboro Drive
Suite 800
McLean, VA 22102

Robert J. Aamoth
Jonathan E. Canis
Reed Smith Shaw & McClay
1301 K Street, NW
Suite 1100 - East Tower
Washington, DC 20005

Eric E. Breisach
Christopher C. Cinnamon
Howard & Howard
107 W. Michigan Avenue
Suite 400
Kalamazoo, MI 49007

Ronald J. Binz
Debra Berlyn
Competition Policy Institute
1156 15th Street, NW
Suite 310
Washington, DC 20005

George Petrutsas
Paul J. Feldman
Fletcher, Heald & Hildreth, PLC
1300 North 17th Street, 11th
Rosslyn, VA 22209

Jonathan M. Chambers
Sprint Spectrum, LP
1801 K Street, NW
Suite M-112
Washington, DC 20036

Anne P. Schelle
America PCS, LP
6901 Rockledge Drive
Suite 600
Bethesda, MD 20817

Jonathan D. Blake
Kurt A. Wimmer
Covington & Burling
1201 Pennsylvania Avenue, NW
P.O. Box 7566
Washington, DC 20044

Gerard J. Waldron
Donna M. Epps
Covington & Burling
1201 Pennsylvania Avenue, NW
P.O. Box 7566
Washington, DC 20044

Susan M. Gately
Susan Baldwin
Economics and Technology, Inc.
One Washington Mall
Boston, MA 02108

Colleen Boothby
Laura F.H. McDonald
Levine, Blaszak, Block & Boothby
1300 Connecticut Avenue, NW
Suite 500
Washington, DC 20036

J. Christopher Dance
Kerry Tassopoulos
Excel Telecommunications, Inc.
9330 LBJ Freeway
Suite 1220
Dallas, TX 75243

Weldon B. Stutzman
Idaho PUC
P.O. Box 83720
Boise, ID.. 83720

James U. Troup
Arter & Hadden
1801 K Street, NW
Suite 400K
Washington, DC 20006

Gary L. Mann
Texas Statewide Telephone Coop., Inc.
2711 LBJ Freeway
Suite 560
Dallas, TX 75234

Robert J. Sachs
Howard B. Homonoff
Continental Cablevision, Inc.
Lewis Wharf, Pilot House
Boston, MA 02110

Frank W. Lloyd
Donna N. Lampert
Mintz, Levin, Cohn, Ferris, Glovsky & Popeo
701 Pennsylvania avenue, NW
Suite 900
Washington, DC 20004

Paul J. Berman
Alan C. Weixel
Covington & Burling
1201 Pennsylvania Avenue, NW
P.O. Box 7566
Washington, DC 20044

Thomas K. Crowe
Law Office of Thomas K. Crowe, PC
2300 M Street, NW
Suite 800
Washington, DC 20037

Prof. Nicholas Economides
Stern School of Business
New York University
New York, NY 10012

Eric B. Witte
Missouri PSC
P.O. Box 360
Jefferson City, MO 65102

Chris Barron
TCA, Inc.
3617 Betty Drive
Colorado Springs, CO 80917

Brenda L. Fox
Continental Cablevision, Inc.
1320 19th Street
Suite 201
Washington, DC 20036

James U. Troup
L. Charles Keller
Arter & Hadden
1801 K Street, NW
Suite 400K
Washington, DC 20006

Michael J. Shortley, III
Frontier
180 South Clinton Avenue
Rochester, NY 14646

Margot Smiley Humphrey
Koteen & Naftalin
1150 Connecticut Avenue, NW
Suite 1000
Washington, DC 20036

Carolyn C. Hill
655 15th Street, NW
Suite 220
Washington, DC 20005

Carol W. Northrop
Christine M. Crowe
Paul, Hasting, Janofsky & Walker
1299 Pennsylvania Avenue, NW
Tenth Floor
Washington, DC 20004

Kathy L. Shobert
General Communication, Inc.
901 15th Street, NW
Suite 900
Washington, DC 20005

Mark J. Tauber
Mark J. O'Connor
Piper & Marbury, LLP
1200 19th Street, NW
Seventh Floor
Washington, DC 20036

Howard J. Symons
Cherie R. Kiser
Russell C. Merbeth
Mintz, Levin, Cohn, Ferris, Glovsky and Popeo, PC
701 Pennsylvania Avenue, NW - Suite 900
Washington, DC 20004

Robert S. Foosaner
Lawrence R. Krevor
Laura L. Holloway
Nextel Communications, Inc.
800 Connecticut Avenue, NW - Suite 1001
Washington, DC 20006

Richard J. Johnson
Moss & Barnett
4800 Norwest Center
90 South Seventh Street
Minneapolis, MN 55402

Alfred M. Mamlet
Colleen A. Sechrest
Steptoe & Johnson, LLP
1330 Connecticut Avenue, NW
Washington, DC 20036

Richard Rubin
Steven N. Teplitz
Fleischman and Walsh, LLP
1400 16th Street, NW
Suite 600
Washington, DC 20036

Don Schoer
Alaska PUC
1016 West Sixth Avenue
Suite 400
Anchorage, AK 99501

Joseph W. Waz, Jr.
Beth O'Donnell
Comcast Corporation
1500 Market Street
Philadelphia, PA 19102

Gene P. Belardi
MobileMedia Communications, Inc.
2101 Wilson Boulevard
Suite 935
Arlington, VA 22201

Daniel M. Waggoner
Davis Wright Tremaine
2600 Century Square
1501 Fourth Avenue
Seattle, WA 98101

David W. McGann
Illinois Commerce Comm.
160 North LaSalle Street
Suite C-800
Chicago, IL 60601

Susan Stevens Miller
Maryland PSC
Six St. Paul Street
Baltimore, MD 21202

James N. Horwood
Scott Strauss
Wendy S. Lader
Municipal Utilities
1350 New York Avenue, NW - Suite 1100
Washington, DC 20005

William J. Celio
Michigan PSC
6545 Mercantile Way
Lansing, MI 48910

Ronald G. Choura
Michigan PSC
6545 Mercantile Way
Lansing, MI 48910

Rebecca S. Weeks
Carl Wayne Smith
Defense Information Systems Agency
701 S. Courthouse Road
Arlington, VA 22204

Mary F. Newmeyer
Alabama PSC
P.O. Box 881
Montgomery, AL 36101

Thomas R. Gibbon
Charles A. Zielinski
Anthony M. Black
Bell, Boyd & Lloyd
1615 L Street, NW - Suite 1200
Washington, DC 20036

Lawrence D. Crocker, III
PSC of DC
450 Fifth Street, NW
Washington, DC 20001

Gerald M. Zuckerman
Edward B. Myers
Communications and Energy Dispute Resolution
Associates
1825 Eye Street, NW - Suite 400
Washington, DC 20006

Timothy E. Welch
Hill and Welch
1330 New Hampshire Avenue, NW
Suite 113
Washington, DC 20036

David A. Gross
Kathleen Q. Abernathy
AirTouch Communications, Inc.
1818 N Street, NW
Washington, DC 20036

Pamela Riley
AirTouch Communications, Inc.
One California Street
San Francisco, CA 94111